

16. PCS's acts of infringement have caused irreparable harm for which there is no adequate remedy at law, and will continue to cause irreparable harm, unless PCS is preliminarily and/or permanently enjoined by this Court.

VI. DEMAND FOR JURY TRIAL

18. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, IPS demand trial by jury in this action of all issues so triable.

VII. PRAYER

Wherefore, IPS respectfully requests that this Honorable Court enter judgment against PCS, granting the following relief:

- A. a preliminary and/or permanent injunction enjoining PCS, its owners, affiliates, officers, directors, managers, agents, servants, employees, trainees, and all persons in active concert or participation with PCS, from continuing to infringe the '060 patent, the '541 patent and/or the '637 patent;
- B. an award of damages adequate to compensate for PCS's infringement of the '060 patent, the '541 patent and/or the '637 patent;
- C. a determination that PCS's infringement of the '060 patent, the '541 patent and/or the '637 patent has been willful;
- D. a determination that this case is "exceptional" under 35 U.S.C. §285, thereby entitling IPS to an award of reasonable attorneys' fees and costs incurred in prosecuting this action;
- E. an award of treble damages based on the willful nature of PCS's infringement;
- F. an accounting of damages resulting from PCS's infringement of the '060 patent, the '541 patent and/or the '637 patent;
- G. an award of pre-judgment and post-judgment interest on all damages; and
- H. such other relief as may be just and appropriate.

